

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

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**STIPULATION FOR AN ORDER ACCEPTING AS TIMELY FILED**  
**THE OBJECTION BY ROBERT COLE TO THE FOURTH AMENDED PLAN**  
**FOR THE ADJUSTMENT OF DEBTS FOR THE CITY OF DETROIT**

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ROBERT COLE and the CITY OF DETROIT, by and through their respective counsel,  
stipulate to the entry of the Order attached hereto as Exhibit 1.

Dated: June 9, 2014

/s/ Benjamin J. Wilensky

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ATTORNEYS FOR THE  
CITY OF DETROIT

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
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**ORDER ACCEPTING AS TIMELY FILED THE OBJECTION  
BY ROBERT COLE TO THE FOURTH AMENDED PLAN  
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This matter having come before the Court on the *Stipulation for an Order Accepting as Timely Filed the Objection by Robert Cole to the Fourth Amended Plan for the Adjustment of Debts for the City of Detroit* (the "Stipulation"); Mr. Cole having previously filed the *Objection by Robert Cole to the Fourth Amended Plan for the Adjustment of Debts for the City of Detroit* (Docket No. 4930, copy with corrected docket text at Docket No. 4950) (the "Objection"); Mr. Cole and the City of Detroit having agreed that the Objection shall be deemed timely filed and shall be subject to all responses, replies, briefs and arguments filed or asserted by the City in connection with confirmation of a plan for the adjustment of debts in the City's chapter 9 case (the "Plan") including, without limitation, the *Consolidated Reply to Certain Objections to Confirmation of the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* (Docket No. 5034) (the "Consolidated Reply"); the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), and (c) notice of the Motion was sufficient under the circumstances; and the Court otherwise being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED, as set forth herein.
2. The Objection is deemed to have been timely filed.
3. The Objection shall be subject to all responses, replies, briefs and arguments filed or asserted by the City in connection with confirmation of the Plan including, without limitation, the Consolidated Reply.
4. The *Ex-Parte Motion to Allow Late Filing of Objection by Robert Cole to the Fourth Amended Plan for the Adjustment of Debts for the City of Detroit* (Docket No. 5055) is deemed withdrawn.

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**CERTIFICATE OF SERVICE**

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Benjamin J. Wilensky hereby certifies that on this 9<sup>th</sup> day of June, 2014, he filed the foregoing document with the Clerk of the Court via the Court's ECF system, which will automatically serve the document upon all counsel of record.

SEIKALY & STEWART, P.C.  
Attorneys for Robert Cole

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